

ORIGINAL

Before the  
Federal Communications Commission  
Washington, D.C. 20554

|                         |   |                     |
|-------------------------|---|---------------------|
| In the Matter of        | ) |                     |
|                         | ) |                     |
| Creation of a Low Power | ) | MM Docket No. 99-25 |
| Radio Service           | ) | RM-9208             |
|                         | ) | RM-9242             |
|                         | ) |                     |

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: The Commission

**COMMENTS SUPPORTING**  
**MOTION FOR EXTENSION OF TIME OF COMMENT**  
**AND REPLY COMMENT DEADLINES**

Saga Communications, Inc. ("Saga"), pursuant to Section 1.46 of the Commission's Rules, hereby files these comments in support of the motion filed March 5, 1999, by the National Association of Broadcasters, the Consumer Electronics Manufacturers Association, and all 50 state broadcasters associations (the "Movants") seeking an extension of time of comment and reply comment deadlines in the above-captioned rule making proceeding.

The Commission's Notice of Proposed Rule Making, *In the Matter of Creation of a Low Power Radio Service*, FCC 99-6, released February 3, 1999 ("NPRM"), was published in the Federal Register on February 16, 1999. The Commission established April 12, 1999, and May 12, 1999, respectively, as the dates for filing comments and reply comments. The Movants have suggested new deadlines of July 12, 1999, for filing comments and October 11, 1999, for filing replies.

The Commission's NPRM proposes to establish a new low power radio service within the FM band. As set forth by Movants, the established periods are too short for the completion and evaluation of studies to measure the effects of the proposal. The Commission's proposal contemplates a number of measures that would relax or eliminate interference protection

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requirements and reduce the FM channel bandwidth. In order to evaluate and properly respond to the issues raised by the NPRM, additional time is necessary.

Saga intends to file comments and participate in this proceeding. Saga is a group owner which, through a series of holding companies, owns 26 FM radio stations. Thus, the decisions the Commission makes with respect to the proposed LPFM service will have a direct impact upon Saga. On March 5, 1999, Saga's counsel requested from the Commission a diskette containing the engineering data used to develop the Commission's proposal. The diskette was received on March 12, 1999. This data must be studied by Saga's technical consultants. That study will require more time than has been allotted. It is not possible by April 12, 1999, to study the data, evaluate the results, and file comments.

The Movants enumerate excellent reasons why additional time is necessary for them to complete and evaluate studies and submit comments. Saga believes these are valid reasons and urges the Commission to grant their motion to extend the dates.

Respectfully submitted,

**SAGA COMMUNICATIONS, INC.**

By: 

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March 15, 1999

**CERTIFICATE OF SERVICE**

I, Angela Y. Powell, a paralegal in the law firm of Smithwick & Belendiuk, P.C., hereby certify that on this 15th day of March, 1999, copies of the foregoing were mailed, postage prepaid, to the following:

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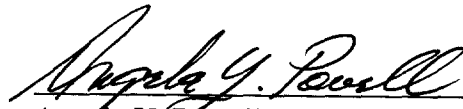
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